



O'MELVENY & MYERS LLP

BEIJING
BRUSSELS
CENTURY CITY
HONG KONG
JAKARTA
LONDON
LOS ANGELES

2765 Sand Hill Road
Menlo Park, California 94025

TELEPHONE (650) 473-2600
FACSIMILE (650) 473-2601
www.omm.com

NEWPORT BEACH
NEW YORK
SAN FRANCISCO
SHANGHAI
SINGAPORE
TOKYO
WASHINGTON, D.C.

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WRITER'S DIRECT DIAL
(650) 473-2674

VIA E-FILE & HAND DELIVERY

WRITER'S E-MAIL ADDRESS
knissly@omm.com

Honorable Ronald M. Whyte
United States District Court
Northern District of California
280 S. First Street
San Jose, CA 95113

**Re: *SK Hynix Semiconductor Inc., et al., v. Rambus Inc.,
United States District Court, Northern District of California,
Case No. CV 00-20905 RMW***

Dear Judge Whyte:

I am writing with a scheduling proposal related to the hearing on December 19, 2012, at 2:00 p.m. in the *SK Hynix v. Rambus* case. The following items are scheduled to be heard that day:

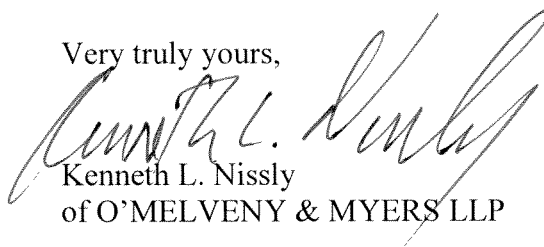
1. Hynix's Motion for Summary Judgment or, in the Alternative, Partial Summary Judgment on the Issue of the Collateral Estoppel Effect of Reexaminations of Rambus's Patents (filed October 17, 2012);
2. Hynix's Motion for New Trial, or in the Alternative, Motion for Stay (filed October 17, 2012);
3. Hynix's Motion for Leave to File Supplemental Reply to Defendant and Counterclaim Plaintiff Rambus Inc.'s Amended Counterclaim (filed October 17, 2012);
4. Sanctions for Rambus's Spoliation (pursuant to the Court's September 21, 2012 Findings of Fact and Conclusions of Law on Spoliation and the Unclean Hands Defense);
5. Rambus's Motion to Amend Findings Under Federal Rule of Civil Procedure 52(b) (filed October 29, 2012).

Hynix believes that it will be difficult to cover all of these matters in a single afternoon. In addition, because much of the briefing on spoliation sanctions was filed under seal, Hynix requests that the Court conduct a closed hearing on that issue. To accommodate these concerns, Hynix proposes that the Court schedule additional hearing time on either December 18 or 20. Hynix's counsel is available at any time on those dates.

Hynix proposes that items 1-3 (the hearing on Hynix's various reexamination-related motions) be heard on Day 1. The briefing on these motions was extensive, encompassing more than 145 pages of briefing, over a thousand pages of evidence from the PTO, and several supplemental submissions regarding recent developments in the PTO reexaminations of Rambus's Farmwald/Horowitz patents (the most recent of which is being filed today). Hynix proposes that item 4 be heard in a closed session on Day 2. Item 5 can be heard on either day.

Thank you for considering this proposal.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kenneth L. Nissly", is written over the typed name and firm name.

Kenneth L. Nissly
of O'MELVENY & MYERS LLP

KLN/

cc: All counsel on ECF Service List (via e-file)

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